



Asociación Interamericana de Hombres de Empresa

CAPITULO DE SAN JUAN

P.O Box 195630 San Juan, PR 00919

June 22, 2012

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Dear Chairman Genachowski:

The Inter American Businessmen Association was founded in 1961 by Hispanic business leaders with the goal of fostering an environment for economic growth and free market principles to solving our common problems. We continue to work with Hispanic leaders to grow new opportunities within the Hispanic community. We are headquartered in the United States Territory of Puerto Rico. As an organization committed to free enterprise, we write to express our concern over your Notice of Proposed Rulemaking as it pertains to wireline third-party billing. While we commend your leadership in protecting consumers against "cramming," we believe that third-party billing for wireline telecommunications services are of great importance to the Hispanic community, and efforts to prohibit them represent an unnecessary overreach with unintended consequences that will prove harmful to the growth of minority-run small businesses and in turn, the nation's economy.

As you consider the proposed rule, we urge you to take into account the current economic situation facing our nation. Small businesses, which are responsible for the creation of more than 60 percent of all jobs in the United States, are struggling to stay afloat. With economic indicators continuing to lag and national unemployment hovering near 8 percent, we should not advance policies that could needlessly hinder businesses' ability to grow and create jobs.

Unfortunately, proposals to limit third-party billing, or ban it outright, could do just that. Third-party billing for wireline telecommunications services allows businesses to consolidate multiple services onto a single bill, eliminating overhead and administrative costs, as well as a need to use high-interest credit cards to for services. Reduced operating costs in turn keep prices low for consumers. Without third-party billing, these businesses would lose a valuable, cost-effective way to stay competitive and expand their business.

A ban on wireline third-party billing would adversely impact the Latino community in particular. Hispanic-owned businesses represent an important part of our economy, growing by nearly 44 percent between 2002 and 2007. This is more than double the national growth rate of 18 percent. Forcing these businesses to handle all billing themselves would needlessly drain resources, harm customer service, prevent hiring, and in turn depress growth.

Moreover, there are a number of Hispanic-owned wireline telecommunications businesses that offer collect calling or long-distance services. Without an effective mechanism to enable third-party billing on the local telephone bill, many of these businesses could not afford to operate, leading to lay-offs and greater unemployment.

A rule prohibiting or limiting third-party billing would also have an adverse impact on Hispanic consumers as well, as more than 11 million calls were made last year between the U.S. and locations throughout Mexico and Latin America by billing the call on the local telephone bill.

While we applaud your efforts to protect consumers from cramming, our country cannot afford new policies that would hurt small businesses and their ability to create jobs. We ask that the Commission consider rules that preserve the benefits of wireline third-party billing and that bear in mind the interests of the Hispanic business and consumer communities.

Sincerely,



Ricardo Aponte Parsi, Esq.
President- Inter American Businessmen Association